

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: DEALER MANAGEMENT
SYSTEMS ANTITRUST LITIGATION**

This Document Relates To:

THE DEALERSHIP CLASS ACTION

MDL No. 2817

Case No. 18-cv-00864

Hon. Rebecca R. Pallmeyer

**DECLARATION OF PEGGY J. WEDGWORTH IN SUPPORT OF DEALERSHIP
CLASS PLAINTIFFS' MOTION FOR CLASS CERTIFICATION**

I, Peggy J. Wedgworth, Esq., pursuant to 28 U.S.C. § 1746, hereby declare:

1. I am a partner at Milberg Coleman Bryson Phillips Grossman PLLC, and I represent Dealership Class Plaintiffs, Continental Autos, Inc., d/b/a Continental Toyota; Continental Classic Motors, Inc., d/b/a Continental Autosports; Kenny Thomas Enterprises, Inc., d/b/a Olathe Toyota; Waconia Dodge, Inc.; John O'Neil Johnson Toyota, LLC; Jim Marsh American Corporation, d/b/a Jim Marsh Mitsubishi Suzuki Kia Mahindra; Pitre Imports, LLC, d/b/a Pitre Kia; Pitre, Inc., d/b/a Pitre Buick GMC; Patchogue 112 Motors LLC, d/b/a Stevens Ford; JCF Autos LLC, d/b/a Stevens Jersey City Ford; Jericho Turnpike Sales LLC, d/b/a Ford & Lincoln of Smithtown; Gregoris Motors, Inc.; Marshall Chrysler Jeep Dodge, L.L.C., d/b/a Marshall Chrysler Jeep Dodge Ram; Cliff Harris Ford, LLC, d/b/a Warrensburg Ford; Warrensburg Chrysler Dodge Jeep, L.L.C., d/b/a Warrensburg Chrysler Dodge Jeep Ram Fiat; and Hoover Automotive, LLC, d/b/a Hoover Dodge Jeep of Summerville (collectively, "Dealership Plaintiffs"), as Dealership Interim Lead Class Counsel and MDL Co-Lead Counsel, in the above-captioned matter.¹ I

¹ I also represent new proposed class representatives in this litigation: Henry Brown Buick GMC, LLC d/b/a Henry Brown Buick GMC; GSM Auto Group, LLC, d/b/a Infiniti Mission Viejo; GSM Auto Group II, LLC, d/b/a Audi Mission Viejo; GSM Auto Group III, LLC, d/b/a Volvo Cars Mission Viejo; Sandy Sansing Chevrolet, Inc. d/b/a Sandy Sansing Chevrolet Pensacola; Tony Automotive Group LLC d/b/a (i)

respectfully submit this declaration in support of Dealership Class Plaintiffs' Motion for Class Certification.

2. I have personal knowledge of the matters set forth herein, and could and would testify competently thereto if called upon to do so.

3. Attached hereto as **Exhibit A** is a true and correct copy of a document containing a list of new proposed class representatives on behalf of Dealers, their corresponding states, and a description of each.

4. Attached hereto as **Exhibit B** is a true and correct copy of the November 21, 2023 Expert Class Certification Report of Dr. Michael A. Williams.

5. Attached hereto as **Exhibit C** is a true and correct copy of the 2023 NADA Annual Financial Profile of America's Franchised New-Car Dealerships.

6. Attached hereto as **Exhibit D** is a true and correct copy of the 2022 NADA Annual Financial Profile of America's Franchised New-Car Dealerships.

7. Attached hereto as **Exhibit E** is a true and correct copy of Milberg Coleman Bryson Phillips Grossman PLLC's firm resume and attorney biographies.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Birmingham, Alabama, this 21st day of November 2023.

/s/ Peggy J. Wedgworth
Peggy J. Wedgworth

Tony Volkswagen; (ii) Tony Hyundai; (iii) Genesis of Waipio; and (iv) Tony Hyundai Honolulu; Tony Hawaii LLC d/b/a Tony Honda; Pacific Nissan LLC d/b/a Tony Nissan; Tony Hawaii Hilo LLC d/b/a Tony Honda Hilo; Tony Hawaii Kona LLC d/b/a Tony Honda Kona; Taylor Chevrolet; Duteau Chevrolet Co., d/b/a DuTeau Chevrolet; Landmark Ford; Automaster BMW; Automaster Honda; Automaster Mercedes-Benz; Mini of Birmingham; L&S Motors of Beckley, Inc., d/b/a L&S Toyota of Beckley; Toyota of Ann Arbor; and Rochester Hills Chrysler Jeep Dodge Ram.

CERTIFICATE OF SERVICE

I, Peggy J. Wedgworth, an attorney, hereby certify that on November 21, 2023, I caused a true and correct copy of the foregoing **DECLARATION OF PEGGY J. WEDGWORTH IN SUPPORT OF PLAINTIFFS' MOTION FOR CLASS CERTIFICATION** to be filed and served electronically via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Peggy J. Wedgworth
Peggy J. Wedgworth